UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

March 17, 2009

Mr. Thomas L. Tidwell, Regional Forester
Northern Region,
200 East Broadway
Missoula, Montana 59802

Re: CEQ # 20090042; Beaverhead-Deerlodge National Forest Final Forest Plan Revision EIS & ROD

Dear Mr. Tidwell:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the final Beaverhead-Deerlodge National Forest, Forest Plan Revision, Environmental Impact Statement (FEIS) and Record of Decision (ROD) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We commend the Northern Region of the U.S. Forest Service and Beaverhead-Deerlodge National Forest (BDNF) for your efforts in reviewing and synthesizing a great amount of input and information during development of the final Forest Plan Revision and EIS. The EPA does not object to the BDNF's preferred alternative, Alternative 6 Modified, although we still consider Alternative 3 to be the environmentally preferred alternative, since Alternative 3 would result in the greatest amount of watershed protection and restoration; highest level of fisheries and wildlife conservation and protection; increased limitations on motorized uses and reductions in road density to protect resources; and higher levels of protection for more pristine areas with unique resource values.

As noted in our earlier comments, while we consider Alternative 3 to be environmentally preferred, we recognize that the BDNF has multiple use responsibilities and must consider many competing needs and balance many environmental, social, economic, and resource management trade-offs. The preferred alternative has many merits and desirable features, and was developed to balance the demand for diverse recreation opportunities; resource protection, and commodity outputs; emphasize aspen restoration; manage motorized and non-motorized uses to minimize user conflicts and protect resource values; and to develop a consistent and integrated aquatic strategy to provide for protection for riparian areas, aquatic species, and clean water.

We are pleased that the Forest Plan includes direction to ensure that management actions avoid further degradation of impaired waters and promote water quality restoration; and that a Forestwide Aquatic Strategy has been developed to protect streams and riparian areas, restore

water quality and watersheds, and conserve fish and other aquatic species, including incorporating INFISH direction for all watersheds, identifying 56 fish conservation key watersheds, and adding an objective to prioritize bull trout restoration. We also appreciate the additional information provided regarding the methodology used for identification of key restoration watersheds on the BDNF.

We do want to state, however, that we remain somewhat disappointed that more aggressive watershed restoration efforts were not proposed, since the preferred alternative still only identifies 15 key watersheds for restoration during the 10 to 15 year planning period, while there are 129 functioning-at-risk and 166 non-functioning stream reaches, 74 watersheds in a "poor" condition with low geomorphic, hydrologic, & biotic integrity on the BDNF, and 269 water quality impaired stream reaches within the analysis area (i.e., 303(d) listed waters). We remain concerned that many impaired waters, degraded watersheds, and non-functioning streams will not be restored on a timely basis. We support a more aggressive and comprehensive commitment to watershed restoration.

Finally, since the BDNF will issue a second ROD based on analysis in the revised FEIS to make site-specific recreation and travel management decisions, we want to once again emphasize the need to reduce sediment delivery from roads, improve or remove road stream crossings, and close or decommission roads which cannot be adequately maintained. As you know roads modify natural drainage networks and accelerate erosional processes resulting in increased stream sedimentation, degradation of aquatic habitats, and altered channel morphology. Roads and motorized uses also fragment and degrade wildlife habitat, displace wildlife and change behavior, reduce reproductive success and security, and increase wildlife stress and mortality. Roads are also a major vector for spreading weeds. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. We encourage road decommissioning and reductions in road density to improve watershed conditions and aquatic health in area streams, as well as to protect and enhance wildlife habitat and connectivity.

The EPA appreciates the opportunity to participate in the Forest Plan Revision and NEPA process. If you have any questions regarding our comments please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022, or via e-mail at potts.stephen@epa.gov . We thank you for your cooperation and consideration.

Sincerely,

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena
Bruce Ramsey, Forest Supervisor, Dillon